



December 28, 2005

Mr. Brian Amme
PEIS Project Manager
Nevada State Office
Bureau of Land Management
PO Box 12000
Reno, Nevada 89520-0006

Same as RMC-0234

Dear Mr. Amme:

1 Douglas Timber Operators is a regional trade association in southwest Oregon with 140 members in forest products and related industries. Our members principally operate in Coos, Douglas and Lane counties, which are the three highest timber-producing counties in Oregon. Most of our larger members have significant timberland holdings, which are the alternate sections in the BLM checkerboard ownership in western Oregon. As such they have a vested interest in how BLM lands are managed to control noxious weeds growing on those lands. In addition the road system which accesses both BLM and private timberlands are managed under a long standing reciprocal R/W program and that road system is critical for access for management purposes as well as fire control. In many cases scotch broom, which is an invasive noxious weed that has been in Oregon for decades, has overgrown many roads making them impassable for vehicular traffic which during fire season is a critical problem. Scotch broom is easily controlled by herbicides and impossible to control by any mechanical means.

2 We have reviewed the EIS that the BLM has prepared to address noxious weeds and compliment your agency on the very thorough analysis that it contains. Our experience in dealing with noxious weeds in this part of Oregon clearly points to the effectiveness of control by herbicides both by ground and aerial application. For this reason we support the selection of Alternative B as the preferred alternative for implementing a noxious weed control program on BLM managed lands. This alternative provides all of the safeguards necessary for effective weed control with herbicides and furthermore is the most cost-effective alternative considered in the EIS. In addition, in our part of the country, safety concerns for forest workers are much less for herbicide applications than mechanical control options.

Thank you for the opportunity to comment.

Sincerely,


Robert E. Ragon
Executive Director

CC: Ms. Katheen Clarke, Director
Ms. Elaine Marquis-Brong, State Director
DTO Board and Steering Committees
Douglas Forest Protective Assn.
Coos Forest Protective Assn.